

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DR. RAJENDRA BOTHRA

Defendant.

Case No. 18-cr-20800-1

Hon. Stephen J. Murphy, III

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**STIPULATED ORDER DISSOLVING POST-INDICTMENT RESTRAINING  
ORDERS [ECF NOS. 98, 101]**

The United States of America, by and through its attorneys, Dawn N. Ison, United States Attorney, and Gjon Juncaj, Assistant United States Attorney, and Dr. Rajendra Bothra, by and through Attorney Anjali Prasad, submit this Stipulated Order Dissolving Restraining Orders [ECF Nos. 98, 101] for immediate entry, and stipulate and agree to the following:

1. An Indictment was filed on December 4, 2018, charging Dr. Rajendra Bothra and other defendants with conspiracy to commit health care fraud, substantive health care fraud counts, conspiracy to unlawfully distribute controlled substances, and substantive counts of unlawful distribution of controlled substances. (ECF No. 1). After indictment, stipulated post-indictment restraining orders were entered by the Court for the purpose of preserving the availability of property subject to forfeiture in these criminal proceedings.

2. Specifically, on February 14, 2019, a Stipulated Post-Indictment Restraining Order to Preserve Financial Assets Subject to Forfeiture, was entered, restraining:

All funds due and owing to Dr. Bothra, The Pain Center USA, PLLC, and/or Interventional Pain Center, and received by the law firm of Rodnick Unger, P.C., obtained in settlement of past, pending, or future civil lawsuits. (ECF No. 98). These funds were also named in, and remain subject to, stayed civil forfeiture proceedings initiated by the government on December 3, 2019. *See United States v. \$12,195,220.59, et al.*, 19-cv-13558.

3. On February 15, 2019, a Stipulated Post-Indictment Restraining Order to Preserve Financial and Real Property Assets Subject to Forfeiture was entered to preserve the availability of the following:

- a. All funds on deposit in Flag Star Bank Account No. 119689860, held by Kaiser Real Estate, LLC. (“Subject Funds”);
- b. Certain real property, identified and defined in Exhibit A to the restraining order; and
- c. All rental income generated by the Subject Real Property.

(ECF. No. 101). The real property identified and defined in Exhibit A to this restraining order remain subject to the pending civil forfeiture proceedings (subparagraph b, above), whereas the property identified in subparagraphs a. and c. above are not subject to the civil forfeiture proceedings.

4. Following a jury trial, on June 29, 2022, Dr. Rajendra Bothra was found “not guilty” on all counts. (ECF No. 447, Jury Verdict Form). As a result of the verdict, forfeiture against the assets covered by the post-indictment restraining orders at ECF No. 98 and 101 is no longer viable in these criminal proceedings.

5. For these reasons, the parties stipulate and agree that the post-indictment restraining orders at ECF Nos. 98 and 101 be, and are hereby, dissolved.

**SO ORDERED.**

s/Stephen J. Murphy, III  
STEPHEN J. MURPHY, III  
United States District Court Judge

Dated: July 15, 2022

Approved as to form and substance:

Dawn N. Ison  
United States Attorney

s/Gjon Juncaj  
Gjon Juncaj  
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Dated: July 14, 2022

s/Anjali Prasad (with consent)  
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Dated: July 14, 2022